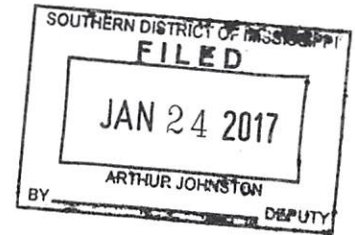


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:17CR5 HTW/FKB

TIFFANY REBECCA BROWN

18 U.S.C. § 371

18 U.S.C. § 641

The United States Attorney charges:

At all times relevant to each count of this Information:

1. Central Mississippi Civic Improvement Association, Inc. ("CMCIA"), d/b/a/ Jackson-Hinds Comprehensive Health Center ("JHCHC") was incorporated in August 1970 as a nonprofit organization. It serves as one of the largest providers of primary health care services for the poor and uninsured in Jackson, Mississippi, and surrounding areas.

2. An unindicted co-conspirator was employed at JHCHC, in Jackson, Mississippi, where she had access to the facility's computer system. The JHCHC computer system contained the personal identifying information, including, but not limited to: names, Social Security Numbers and dates of birth, of current and former patients of JHCHC.

3. The Internal Revenue Service ("IRS") was an agency of the United States Department of the Treasury responsible for enforcing and administering the federal tax laws of the United States and paying income tax refunds in the form of electronic bank deposits to the citizens of the United States.

4. Bank of America, Regions Financial Institution, and Wells Fargo were financial and banking institutions, the accounts and deposits of which were insured by the Federal Deposit Insurance Corporation. Each of these financial and banking institutions was an organization

whose normal activities took place in the interstate and foreign commerce and which had an effect on interstate and foreign commerce.

5. Defendant **TIFFANY REBECCA BROWN**, and her unindicted co-conspirators were residents of the Southern District of Mississippi.

6. A “means of identification” is any name or number that may be used, alone or in conjunction with any other information, to identify a specific individual, including a name, Social Security number, or date of birth.

COUNT 1

7. The allegations contained in paragraphs 1-6 of this Information are hereby re-alleged and incorporated herein as if fully set forth in this paragraph.

8. From in or about at least January of 2010, and continuing through at least July of 2013, in Hinds County in the Jackson Division of the Southern District of Mississippi, and elsewhere, the defendant, **TIFFANY REBECCA BROWN**, and the unindicted co-conspirators did unlawfully, voluntarily, intentionally, and knowingly conspire, combine, confederate, and agree together and with each other and with other individuals both known and unknown, to defraud the United States for the purpose of impeding, impairing, obstructing, and defeating the lawful Government functions of the Internal Revenue Service of the Treasury Department in the ascertainment, computation, assessment, and collection of the revenue: to wit, income taxes. The conspiracy was carried out in the manner and means as follows:

9. It was an object of the conspiracy that the defendant, **TIFFANY REBECCA BROWN**, and the unindicted co-conspirators and other persons known and unknown, would cause the presentation of false claims to the IRS by preparing and submitting false U.S. Individual Income Tax Returns, Forms 1040 for tax year 2009 through 2012, using stolen identities.

10. It was part of the conspiracy that an unindicted co-conspirator would obtain from her employer, JHCHC, personal identifying information from the facilities computer system without the permission of said patients. The personal identifying information included the names, addresses, social security numbers, and dates of birth for said patients.

11. It was part of the conspiracy that the unindicted co-conspirator would then provide the patient identifying information to Defendant **ALSHER WILLIAMS a/k/a Alicia Williams** without the patients' permission for use in the preparation and submission to the IRS of false Forms 1040, U.S. Individual Income Tax Returns.

12. It was part of the conspiracy that an unindicted co-conspirator then provided this identifying information to Defendant **TIFFANY REBECCA BROWN**, who agreed to use the personal identifying information for the purpose of fraudulently creating and filing false, fictitious, and fraudulent tax returns in order to obtain monetary payment in the form of tax refunds from the United States Department of Treasury.

13. It was further a part of the agreement, combination, and conspiracy that tax refunds would be, and were, electronically deposited into bank accounts controlled by unindicted co-conspirators. Thereafter, Defendant **TIFFANY REBECCA BROWN** and the unindicted co-conspirators would cause the funds from the fraudulent tax refunds to be used for the personal benefit of each other.

14. In furtherance of the unlawful conspiracy and in order to accomplish the objectives thereof, the following overt acts, among others, were committed:

15. On or about March 28, 2012, Defendant **TIFFANY REBECCA BROWN**, and her unindicted co-conspirators caused a false U.S. Individual Income Tax Return, Form 1040, in the name of M.H. to be electronically filed with the IRS by wire communication from Jackson, Mississippi, to Austin, Texas, using the stolen personal identifiers belonging to M.H., including

but not limited to, name, dates of birth, and social security number causing \$1,1439.00 to be deposited into Bank of America account number xxxxxxxx4910.

16. On or about April 3, 2012, Defendant **TIFFANY REBECCA BROWN**, and her unindicted co-conspirators caused a false U.S. Individual Income Tax Return, Form 1040, in the name of J.B. to be electronically filed with the IRS by wire communication from Jackson, Mississippi, to Austin, Texas, using the stolen personal identifiers belonging to J.B., including but not limited to, name, dates of birth, and social security number causing \$1,1439.00 to be deposited into Wells Fargo account number xxxxxx7954.

17. On or about May 9, 2012, Defendant **TIFFANY REBECCA BROWN**, and her unindicted co-conspirators caused a false U.S. Individual Income Tax Return, Form 1040, in the name of K.T. to be electronically filed with the IRS by wire communication from Jackson, Mississippi, to Austin, Texas, using the stolen personal identifiers belonging to K.T., including but not limited to, name, dates of birth, and social security number causing \$1,1439.00 to be deposited into Bank of America account number xxxxxxxx6440.

18. On or about May 9, 2012, Defendant **TIFFANY REBECCA BROWN**, and her unindicted co-conspirators caused a false U.S. Individual Income Tax Return, Form 1040, in the name of C.H. to be electronically filed with the IRS by wire communication from Jackson, Mississippi, to Austin, Texas, using the stolen personal identifiers belonging to C.H., including but not limited to, name, dates of birth, and social security number causing \$1,1439.00 to be deposited into Regions account number xxxxxx6980.

19. On or about July 17, 2012, Defendant **TIFFANY REBECCA BROWN**, and her unindicted co-conspirators caused a false U.S. Individual Income Tax Return, Form 1040, in the name of A.W. to be electronically filed with the IRS by wire communication from Jackson,

Mississippi, to Austin, Texas, using the stolen personal identifiers belonging to A.W., including but not limited to, name, dates of birth, and social security number causing \$1,1439.00 to be deposited into Regions account number xxxxxx6980.

All in violation of Section 371, Title 18, United States Code.

COUNT 2

20. On or about June 13, 2012, in Hinds County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **TIFFANY BROWN**, and her unindicted co-conspirators aided and abetted by each other, and others known and unknown, did willfully and knowingly steal, purloin, and knowingly convert to their own use and the use of another, property of the United States, that is: money of the United States, namely funds of a value exceeding \$1,000.00, administered by the Department of Treasury in the form of federal tax refunds in the name of the individual whose initials are J.M., which were deposited into a Regions bank account xxxxxx6980, listed below, which funds defendant, **TIFFANY BROWN**, and her unindicted co-conspirators were not entitled to receive, in violation of Sections 641, and 2, Title 18, United States Code.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses as alleged in this Information, the defendant shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses. Further, if any property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been

commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendant, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Sections 981(a)(1)(C), and 982(a)(7), Title 18, United States Code and Section 2461, Title 28, United States Code.


GREGORY K. DAVIS
United States Attorney